

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

WENDY GAUTHIER,

Plaintiff

v.

SUNHEALTH SPECIALTY
SERVICES, INC. and SUNBRIDGE
HEALTHCARE CORPORATION,

Defendants

CIVIL ACTION NO.: 05CV40119-FDS

JOINT MOTION TO STAY DISCOVERY AND ALL OTHER DEADLINES

The Plaintiff, Wendy Gauthier, and the Defendants, Sunhealth Specialty Services, Inc. and Sunbridge Healthcare Corporation, hereby request that because the parties have agreed to enter into mediation, the Court stay discovery as well as all other deadlines in this matter until mediation has been concluded.

1. The parties are interested in making a good faith effort to resolve this matter prior to a trial on the merits;
2. The parties are interested in avoiding further expense associated with continuing the discovery they have already begun;
3. The parties have agreed to mediate and will continue discovery only if the matter is not resolved at the mediation; and
4. The parties have selected a mediator and are in the process of selecting a date for the mediation.

Wherefore, the parties jointly request that the Court stay discovery as well as all other deadlines until the mediation is concluded.

Respectfully Submitted,

The Plaintiff
WENDY GAUTHIER
By Her Attorney

/s/ Michael O. Shea
MICHAEL O. SHEA, ESQ.
BBO# 555474
Law Office Of Michael O. Shea, P.C.
451 Main Street
Wilbraham, MA 01095
Telephone: (413) 596-8005
Facsimile: (413) 596-8095

Respectfully Submitted,

The Defendants
SUNHEALTH SPECIALTY
SERVICES, INC. and SUNBRIDGE
HEALTHCARE CORPORATION
By Their Attorney

/s/ Michael Williams
MICHAEL WILLIAMS, ESQ.
BBO# 634062
Lawson & Weitzen, LLP
88 Black Falcon Avenue, Suite 345
Boston, MA 02110
Telephone: (617) 439-4990
Facsimile: (617) 439-3987

Signed and Submitted: September 22, 2006